

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

Curt O. Hall, ) C.A. NO. 2019-CP-23-06076  
Plaintiff, ) (State Court Caption)  
v. )  
UBS Financial Services Inc., )  
Mary Lucy Reid, Individually, and )  
Ryan McLaughlin, Individually )  
Defendants. )

---

**DEFENDANTS' JOINT ANSWERS TO LOCAL 26.01 INTERROGATORIES**

Pursuant to Local Civil Rule 26.01 of the District of South Carolina, Defendants UBS Financial Services Inc. (“UBS”), Mary Lucy Reid (“Ms. Reid”), and Ryan McLaughlin (“Ms. McLaughlin”) (collectively “Defendants”) answer the following Interrogatories:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**Answer:** **None.**

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**Answer:** **Defendants agree claims are subject to a jury trial.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**Answer:** Defendant UBS Financial Services Inc. is a wholly-owned subsidiary of UBS Americas, Inc., which is a wholly-owned subsidiary of UBS Americas Holding, LLC. UBS Americas Holding, LLC is a wholly-owned subsidiary of UBS AG, which is a wholly-owned subsidiary of UBS Group AG, a publicly held corporation.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**Answer:** Defendants object to the venue chosen by Plaintiff, the Court of Common Pleas, Thirteenth Judicial Circuit, Greenville County, South Carolina, and remove this action to the United States District Court for the District of South Carolina, Greenville Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the case: arise from the same or identical transactions, happenings, or events; involved the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**Answer:** No.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correction identification.

**Answer: Not applicable.**

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**Answer: Not applicable.**

Dated this 25th day of November 2019.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

s/Ashley P. Cuttino

Ashley P. Cuttino, SC Bar No. 70354  
Evelyn A. Norton, SC Bar No. 102792

Attorneys for Defendants UBS Financial  
Services Inc., Mary Lucy Reid, and Ryan  
McLaughlin

The Ogletree Building  
300 North Main Street, Suite 500 (29601)  
Post Office Box 2757  
Greenville, SC 29602  
Phone: 864.271.1300  
Facsimile: 864.235.8806

**CERTIFICATE OF SERVICE**

I hereby certify that this Joint Notice of Removal was filed through the CM/ECF federal court electronic e-filing system and U.S. Mail, First Class postage prepaid, on this 25th day of November 2019, to:

Townes B. Johnson III  
Townes B. Johnson III, LLC  
P.O. Box 9246  
Greenville, SC 29604  
tjohnson@sc.legal  
Attorney For Plaintiff

s/Ashley P. Cuttino

Ashley P. Cuttino

40859518.1